

**BEFORE THE
FEDERAL MARITIME COMMISSION**

**KAWASAKI KISEN KAISHA
LTD.; NIPPON YUSEN KAISHA;
UNITED ARAB SHIPPING COMPANY
(S.A.G.); and YANG MING MARINE
TRANSPORT CORPORATION,**

Complainants,

v.

**THE PORT AUTHORITY OF NEW YORK
AND NEW JERSEY,**

Respondent.

Docket No. 11-12

STATUS REPORT AND REQUEST FOR ENLARGEMENT OF TIME

Complainants submit the following status report pursuant to the Presiding Officer's Order on Motions for Final Judgment and to Amend Complaint and Order to File Status Report, dated September 5, 2013 ("Order"). In addition, for good cause Complainants request a seven-day enlargement in the time period for filing status reports under that Order.

Complainants Nippon Yusen Kaisha, United Arab Shipping Company (S.A.G.); and Yang Ming Marine Transport Corporation each have determined to move to withdraw from this proceeding. Complainants each remain consistent in their conviction that the CFC plainly violates the Shipping Act. However, the unreasonable costs and burdens of unbounded discovery into commercial issues immaterial to the Complainants' case, coupled with the lack of any decision on Complainants' initial summary judgment motion or Complainants' remaining challenge to the CFC as a matter of law (based wholly on undisputed facts), has led three of the four Complainants to elect not to proceed. Accordingly, an appropriate motion or motions will be filed this week.

Given that the decisions of the withdrawing parties were reached only very recently, Complainant "K" Line America, Inc. has not had an opportunity to fully consider the issues presented by the withdrawal of the other Complainants or to craft its own course of action in light of these developments. Accordingly, Complainants respectfully request that the time period for filing a status report be enlarged by seven days. This brief extension would afford "K" Line a week to assess its options, formulate appropriate next steps, and file a supplementary status report addressing the matters outlined in the Order, while the other Complainants formally move to withdraw.

Respectfully submitted,

John P. Meade

John P. Meade
"K" Line America, Inc.
6009 Bethlehem Road
Preston, MD 21655
(410) 673-1010
john.meade@us.kline.com

Counsel for Kawasaki Kisen Kaisha Ltd.

Matthew J. Thomas

Matthew J. Thomas
Reed Smith LLP
1301 K Street, N.W.
Suite 1100 – East Tower
Washington, D.C. 20005
(202) 414-9257
mjthomas@reedsmith.com

Counsel for Complainants

Dated: September 16, 2013

CERTIFICATE OF SERVICE

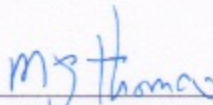
I hereby certify that I caused a true and correct copy of the foregoing Status Report and Motion for Enlargement of Time to be served September 16, 2013, via e-mail and UPS, upon the following:

Richard A. Rothman
Jared Friedman
Reed Collins
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
richard.rothman@weil.com
jared.friedmann@weil.com

Peter D. Isakoff
WEIL, GOTSHAL & MANGES LLP
1300 Eye Street, N.W.
Suite 900
Washington, D.C. 20005
peter.isakoff@weil.com
alex.levine@weil.com

Ashley W. Craig
David G. Dickman
Elizabeth Lowe
VENABLE LLP
575 7th Street, N.W.
Washington, D.C. 20004
awcraig@venable.com
dgdickman@venable.com
ldeade@venable.com

Counsel for Respondent



Matthew J. Thomas